## IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:

BKCY NO. 19-23657-TPA

Connie E. Lucot aka Constance E. Lucot,

Chapter 13

Debtor.

#### NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that, pursuant to Rule 9010 of the Bankruptcy Rules, South Allegheny School District is a creditor and hereby appears in this case.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 2002 of the Bankruptcy Rules, the undersigned requests that all notices and papers specified by the Rule, and all other notices given or required to be given in this case and all other papers served or required to be served in this case, be given to and served upon:

Jennifer L. Cerce, Esquire Lawrence J. Maiello, Esquire Maiello, Brungo & Maiello, LLP – Tax Division 100 Purity Road, Ste. 3 Pittsburgh, PA 15235 Telephone: (412) 242-4400

Facsimile: (412) 727-1667

The foregoing request includes without limitation, notices of any orders, pleadings, motions, applications, complaints, demands, hearings, requests or petitions, disclosure statements, answering of reply papers, memoranda and briefs in support of any of the foregoing and any other document brought before this Court with respect to these proceedings, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery telephone, telegraph, telex or otherwise that (1) affects or seeks to affect in any way any rights or interest of any creditor or party in interest in the case with respect to the (a) debtor, (b) property of the debtor's estate, or proceeds thereof, in which the debtor may claim an interest, or (c) property or proceeds thereof in the

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possession, custody or control of others that the debtor may seek to use; or (2) requires

or seeks to require any act, delivery of any property, payment, or other conduct.

PLEASE TAKE FURTHER NOTICE that the South Allegheny School District

intends that neither this Notice of Appearance nor any later appearance, pleading, claim

or suit shall waive (1) their right to trial by jury in any proceeding so triable in this case or

any case, controversy, or proceeding related to this case; or (2) any other rights, claims,

actions, defenses, setoffs, or recoupments to which they may be entitled to under

agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses

setoff, and recoupments are expressly reserved.

MAIELLO, BRUNGO & MAIELLO, LLP

Dated: October 30, 2019

/s/ Jennifer L. Cerce

Jennifer L. Cerce, Esquire Pa. I.D. No. 81157

424 S. 27th Street, Ste. 210

Pittsburgh, PA 15203

(412) 242-4400

Attorneys for South Allegheny School District

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### **DECLARATION IN LIEU OF AFFIDAVIT**

I certify that this request supersedes any prior request for Notice by this creditor, that there is no other request to receive Notices for the specified creditor, and that I am authorized to make this request for Notices on behalf of the named creditor.

MAIELLO, BRUNGO & MAIELLO, LLP

Dated: October 30, 2019 /s/ Jennifer L. Cerce

Jennifer L. Cerce, Esquire Pa. I.D. No. 81157 424 S. 27<sup>th</sup> Street, Ste. 210 Pittsburgh, PA 15203 (412) 242-4400

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# CERTIFICATE OF MAILING OF NOTICE OR OTHER DOCUMENT TO PARTIES IN INTEREST

Connie E. Lucto Aka Constance E. Lucot 1035 Alquin Street McKeesport, PA 15133

Charles J. Grudowski, Esquire Grudowski Law Associates, P.C. Law & Finance Building 429 Fourth Avenue, Ste. 1001 Pittsburgh, PA 15219

Ronda J. Winnecour, Esquire Suite 3250, USX Tower 600 Grant Street Pittsburgh, PA 15219

Office of the United States Trustee Suite 970, Liberty Center 1001 Liberty Avenue Pittsburgh, PA 15222

MAIELLO, BRUNGO & MAIELLO, LLP

Dated: October 30, 2019 /s/ Jennifer L. Cerce

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